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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Wild Horse Education, a non-profit  
corporation,

Plaintiff,

v.

United States Department of Interior  
Bureau of Land Management,

Defendant.

Case No. 3:25-cv-00152-MMD-CSD

**Joint Stipulation for Extension Of Time  
To File Response To Amended  
Complaint**

**(First Request)**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiff Wild Horse Education, a non-profit corporation, and Federal Defendant, United States Department of Interior, Bureau of Land Management, through undersigned counsel, hereby stipulate and agree as follows:

1. Plaintiff filed its First Amended Complaint for Declaratory and Injunctive Relief on July 03, 2025 (ECF No. 17).
2. Federal Defendant's response to the Amended Complaint is currently due on July 17, 2025.
3. Plaintiff and Federal Defendant agree and stipulate that Federal Defendant's time to respond to Plaintiff's Amended Complaint shall be extended up to and including July 25, 2025.

4. Federal Defendant requires additional time to accommodate her existing case load due to staffing shortages and conflicting deadlines on other matters she is handling. Specifically, Federal Defendant's counsel has an oral argument scheduled for July 17th in another matter that requires substantial preparation.

Accordingly, the Parties respectfully request that the Court extend the deadline for the United States to file a responsive pleading to Plaintiff's Amended Complaint up to and including July 25, 2025.

This stipulated request is filed in good faith and not for the purpose of undue delay.

Respectfully submitted this 16th day of July 2025.

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**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

**DATED:** July 17, 2025